

Declaration of Vicki Aznaran

7 Mar 1994

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY No. CV 91-6426 HLH (Tx) INTERNATIONAL,
DECLARATION OF VICKI AZNARAN
Plaintiff, RE: MOTION FOR COSTS

VS. Date: APRIL 4, 1994
Time: 10:00 a.m.
STEVEN FISHMAN and UWE GEERTZ, Courtroom: 7

Defendants.

1. I, Vicki Aznaran, declare and say: I am over the age of eighteen and a resident of Texas. I have personal knowledge of the matters set forth in this declaration and if called upon to do so, I could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of a declaration I executed July 18, 1990 for use in the case United States of America v. Steven Fishman, Case No. XR-88-0616-DLT. The contents of that declaration (Exhibit A) were true and correct when executed and they remain true and correct as of the date of execution of this declaration. The contents of Exhibit A are expressly incorporated herein and made a part hereof.

MY BACKGROUND IN SCIENTOLOGY

3. I joined the Church of Scientology in 1972. In 1978, after approximately four years as staff members, my husband and I joined the Sea Organization. From 1978 to early 1987, my husband and I worked most of our waking hours, with very few days off, at our various assignments within Scientology. I eventually became President of Religious Technology Center and, supposedly, the top "ecclesiastical" authority within Scientology. Richard was a high-level security officer. During this period my husband and I became intimately familiar with the structure and activities of various Scientology organizations. Among other things, I was briefed and was sometimes a participant in meetings involving litigation tactics and various means used to attack and fight "enemies" of Scientology.

In numerous instances I was in the chain of command for approval for such activities. From 1984 to 1987, I held the office of Inspector General one of the highest worldwide offices in the organization and so was privy to the most arcane practices of the group.

4. Between its incorporation in 1982 and 1987 when I left Scientology, I was on the staff of the Religious Technology Center, (RTC). I held the position that is now being held by David Miscavige. Since 1978, I was a high ranking member of the Sea Organization, an elite organization within Scientology. At the time I left Scientology I was highly trained as a technical expert (Class 9 auditor) and an administrator (Data Series evaluator course and organization executive course). To complete the Organization Executive Course, one must study all policy letters written by Hubbard which comprise a large hardbound volumes.

VAUGHN AND STACY YOUNG'S BACKGROUND IN SCIENTOLOGY

5. During my tenure as Inspector General of RTC, I knew both Vaughn and Stacy Young well. They were well known to me because of their Scientology staff positions. Vaughn Young was posted as L. Ron Hubbard's personal public relations officer in Special Project which later became ASI (Author Services, Inc.) Special Project as well as ASI were headed by David Miscavige and Norman Starkey. LRH's personal public relations officer has traditionally been a high ranking position in Scientology. Vaughn Young was also charged with writing Hubbard's biography after Gerald Armstrong (Sea Organization staff member who was working on the biography along with author Omar Garrison) left Scientology. This was during the period that Vaughn worked as Hubbard's PR. Vaughn Young worked as Hubbard's PR after Hubbard's death as well. Vaughn Young was summoned to Hubbard's ranch after his death, just as Miscavige was. Miscavige was not summoned prior to Hubbard's death. Hubbard only summoned Ray Mithoff just prior to his death, and of course, Annie and Pat Brocker, who lived with Hubbard exclusively during his last six years. In fact, Miscavige, and a host of other staff members, myself and Vaughn Young included, who were summoned to the ranch by the Brockers, were not those that Hubbard wished to see before he died, as he summoned the only ones that he wished to see. Miscavige was quite deflated over it. It is apparent from Miscavige's declaration that he took it to mean Vaughn Young and the others who came after Hubbard was gone, were not of any significance.

6. In the early 1980's, Stacy Young was posted in Special Project as the organizing officer. Special Project was headed by David Miscavige. It had about 15 staff members total. Organizing Officer is a high ranking post in any Scientology Organization. It is a member of the executive council. Stacy Young was later posted at various posts in OSA doing work as a PR. ASI was not a large organization, about 15 staff. At the time I was in RTC, ASI was a very high level organization, placed above RTC in the chain of command. The staff of ASI received their orders from L. Ron Hubbard, and his aide who lived with him, Pat Brocker. When I was a staff member of a Scientology mission from 1973 to 1978, I knew of Vaughn Young because he was a very high profile spokesman for Scientology and the Guardian's Office.

SCIENTOLOGY OFFICIALS AVOIDING SERVICE OF PROCESS

7. It is routine policy for the upper executives of Scientology to avoid service of process. This is why mere mid level executives, such as the Reverend Heber Jentzsch, are appointed to corporate posts such as President of Church of Scientology International. Corporate posts have nothing to do with either power or the command chart in Scientology. This policy was in place throughout my tenure in the Commodore's Messenger Organization (from 1978 until 1987). This policy is designed to keep those who knew Scientology's secrets from being in a position where the secrets might be revealed. Hubbard went into seclusion for his last years allowing only Pat and Annie Brocker access to him, just for the purpose of avoiding service in lawsuits and subpoenas in criminal matters. All security personnel are trained to keep any and all process servers away from Scientology executives. When David Miscavige was one of the targets of an IRS CID investigation (there were several individuals targeted), he expressed great concern over having to go to jail. Due to his diminutive size, he was very concerned that he would be sexually harassed while in a jail with common criminals." At this time he devised several schemes to flee the country should the IRS decide to make arrests. Avoiding service of process is a tactic that Miscavige is well acquainted with. (See Attached Exhibit D). I recognize Exhibit B as being a copy of the Scientology internal document Project Quaker with which I was familiar whilst serving in various Scientology posts.

MISCAVIGE AS READ OF SCIENTOLOGY AND MANAGING AGENT OF THE VARIOUS SCIENTOLOGY CORPORATIONS INCLUDING CSI.

8. David Miscavige was the Chairman of the Board of Author Services, Inc., ("ASI") in 1984 and 1985. ASI was incorporated to be the funnel through which profits from Scientology were channelled to L. Ron Hubbard and, therefore, it was very important within Scientology. Miscavige represented Hubbard in all aspects of controlling Scientology. He attended regular meetings with myself and other top officials of Scientology organizations to review the status of all Scientology's activities, including its litigation and dirty tricks campaigns against Scientology's enemies.

9. During the time I held the post of Chairman of the Board of RTC, David Miscavige held the post of Chairman of the Board of ASI. During this time, he maintained control of the executives at the top of Scientology's command channels, Marc Yager, CO CMO Int and head of the Watchdog Committee, Guillaume Lesevre, ED International, Ray Mithoff, Senior C/S International, myself as Inspector General and COB of RTC. Miscavige became head of RTC in March of 1987, at this point he moved Marc Yager and Ray Mithoff from their positions in CSI into RTC. He also moved Mark Rathbun, LRH Legal IC or Special Project L, and Greg Wilhere from their

positions in ASI into RTC. I now see from the declarations of Marc Yager and Ray Mithoff, that Miscavige has now placed them back into CSI. This is but one small illustration of his ongoing control over the CSI corporation.

10. Miscavige has, since 1981, been the decision maker over what lawsuits are filed by Scientology and how any lawsuits Scientology is engaged in are to be litigated. He does this without regard to the particular Scientology corporate entity (s) involved in the litigation. Miscavige has never allowed anyone else to make the final decisions concerning such matters. During my tenure as Inspector General of RTC, as well as the head of the 040 mission which took over the US Guardian's Office, as outlined in Miscavige's declaration, I attended many meetings and saw countless orders from Miscavige concerning Scientology's litigation. During all trials, Miscavige receives daily transcripts and issues orders directly to the attorneys, no matter which particular Scientology corporate entity has been chosen to bring the litigation or which entity has been sued. The heads of CSI would never be allowed to independently bring or initiate a lawsuit. During my tenure in RTC, Miscavige received a "legal daily report", of which I received a copy. This report contained summaries of everything that occurred on any of Scientology's lawsuits. Miscavige would issue orders and call meetings concerning these matters on a regular basis. Litigation is very costly and can result in severely adverse PR. Therefore, Miscavige was never willing for the decisions concerning it to be turned over to anyone else.

THE DEATH OF FLO BARNETT

11. Flo Barnett's suicide was a scandal within the inner circles of Scientology. This was not due to the fact that she supposedly committed suicide, but due to the fact that she had become a member of a declared enemy group, David Mayo's Advanced Ability Center. She was receiving auditing and assistance from this group and at the time of her death, possessed a pack of the NED for OTS (secret upper level auditing procedures) which were believed to have come from David Mayo's group. Flo Barnett's membership in this group made her a suppressive person as she was actively "squirreling" and a member of a suppressive group. The fact that David Miscavige was linked to her by familial ties was extremely repugnant to him and to his wife, Michelle Miscavige. David Miscavige's comment upon her death was that "the bitch got what she deserved." His wife Shelly, did not appear to feel any different about it than David. I asked Shelly if she was doing alright since receiving this bad news. She said that personally she was doing just fine and that this was an excellent opportunity to find out where the NED for OTs materials had come from and to use it as leverage against Mayo. She also stated that it was not surprising that this happened to her mother since she had been "squirelling". The circumstances of the deaths of both Flo Barnett and Yvonne Jentsch are very relevant to the issues in this case, as I understand them to be.

THE PURPORTED PURGE OF THE SCIENTOLOGY CRIMINALS

12. Hendrick Moxon, currently an attorney for Scientology in this very case, and a member of the Sea Organization, was a prominent participant in the criminal activities of the Guardian's Office. Prior to becoming an attorney at Scientology's expense, he was a Guardian's Office staff member in Washington, D.C. Moxon was involved in the Scientology conspiracy to infiltrate the U.S. government. This conspiracy was uncovered by the F.B.I. in 1977. Scientology then stipulated to their crimes which included Moxon's involvement in those crimes. Nine senior Scientologists, including Hubbards' wife, went to jail as a result of these criminal activities conducted by, and on behalf of, the Church of Scientology. I became familiar with certain documents, which are attached hereto, while being in charge of the 1981/82 040 mission to take over the USGO. Moxon was involved in the criminal activity, attempted cover-ups and obstruction of justice. The US government subsequently prosecuted 11 top officials of Scientology and named Moxon as an unindicted co-conspirator. (See Exhibit C, pages 212-214). This is but one small example to illustrate that Miscavige has not and will never offload the criminal element from Scientology's ranks. Miscavige is well aware of Moxon's status and maintains him as a high level legal staff in the Sea Organization.

As a practicing Scientologist and in-house Scientology lawyer, Kendrick Moxon's first duty is to protect Miscavige and Scientology. This duty is paramount to any duty he might otherwise owe the Court or the law.

13. Scientology was created by L. Ron Hubbard in the 1950's. The policies and beliefs of Scientology were established by L. Ron Hubbard. L. Ron Hubbard created the Guardian's office based on his beliefs and ideals. The Guardian's Office was headed by his wife, Mary Sue Hubbard. During the late 1960's and the 1970's, many, many crimes were committed internationally by the Guardian's Office. Hubbard was well aware of the Guardian's Office activities and this is apparent from the reams of paper containing his various orders to the Guardian's Office.

The policies and beliefs and ideals that established Scientology and the Guardian's Office are still in place today, just as they were in the 1950's, 1960's, 1970's and 1980's. These have not changed as it is against the very heart of Scientology to change or alter any of Hubbard's teachings and belief. The activities of the Guardian's Office have not disappeared any more than Scientology's "enemies" have. These activities are carried on by the staff of the Office of Special Affairs ("OSA") and their hired private investigators who ostensibly work for Scientology lawyers, and are thus protected by the attorney work product privilege.

Scientology learned the hard way to keep its criminal activities at arm's length. An example of this is private investigator, Eugene Ingram, who was hired by Miscavige, to get the evidence on adverse attorney, Michael Flynn, for supposedly forging a check on L. R. Hubbard's account. Ingram paid money to Ala Tamimi, a criminal in jail, for a statement saying he was hired to forge the check by Michael Flynn. I was then informed by Mark Rathbun, then Miscavige's legal executive in ASI, that Ingram bribed Tamimi in order to get Michael Flynn charged criminally. After this incident failed, I learned that Ingram was spending quite some time living in Mexico in order to avoid the authorities investigating the matter.

MISCAVIGE STRIKING SCIENTOLOGY STAFFERS

14. Contrary to the claims in his February 4, 1994, declaration Miscavige has struck staff members when they do things he dislikes.

In 1981, I witnessed him hitting John Axel, a Sea Org member in the mouth in 1982. Miscavige had two other tall male staff members to back him up when he hit John Axel. This despite the fact that John Axel is a fairly small and very mild-mannered individual. Miscavige also does such things as set up photos of staff members who have fallen into disregard and use them as targets for pistol shooting.

I witnessed him doing this with the Golden Era Musicians, Of which Fernando Gamboa was one of his targets.

THE DEATH OF HUBBARD

15. When I arrived at Hubbard's ranch, in San Luis Obispo, following his death, I was informed by Miscavige that Hubbard was dead and that he did not want to see "any grief bullshit about it."

Earl Cooley, Esq. and others convinced the San Luis Obispo coroner not to do an autopsy on Hubbard's body which was cremated approximately 24 hours after death. Miscavige then announced to the Scientology world that Hubbard had "dropped the body" and would continue his work elsewhere. Scientologists believe that upon death the person drops the body, picks up another body and continues to serve Scientology. This is how the billion year Sea Organization employment contract is performed.

16. I was aware just before Hubbard's death, that certain IRS indictments were about to be handed down against Hubbard. Miscavige reportedly said that "the only way to stop it now is if the old man [Hubbard] dies."

17. I was one of the small group summoned to the Hubbard ranch after he died. Vaughn Young and David Miscavige were also summoned to the ranch.

THE DEATH OF MIKE RINDER'S BABY

18. Mike Rinder, a member of the CMO International and his wife, Kathy, had a newborn baby in Clearwater, Florida in the early eighties. Mike Rinder was in Gilman Hot Springs, California at the time. This baby died when only a few days old. The baby had received Hubbard's baby care technology. After the baby died, Rinder asked to receive some time off to go to be with his wife and family.

When Miscavige was told of this, he responded that time off was "bullshit" and Rinder did not need time off, he just needed to work as his stats ("statistics") were down. Besides the baby would get another body and there was nothing to be so upset about.

END OF CYCLE PROCESSING

19. The term "End of Cycle" does exist in Scientology. it means to terminatedly end something. There are many

Scientology processes and routines that incorporate this concept. The idea that someone ends cycle when they die is a Scientology concept and is expressed in Hubbard's writings. (See attached Exhibit D)

THE TIME MAGAZINE ARTICLE WAS NOT OF AND CONCERNING CSI

20. I have read the Time Magazine article entitled "Scientology Thriving Cult of Greed and Power" published on May 6, 1991. In particular, I have read two paragraphs of that article concerning comments allegedly attributed to Steven Fishman and Dr. Uwe Geertz.

There are references to "Scientology" and "the church" in these two paragraphs. I have also been advised by Graham E. Berry, Esq., that the Church of Scientology International alleges that the words "Scientology" and "the Church" were "of and concerning" Church of Scientology International ("CSI"). This allegation is absurd and false. CSI is a management church only. It has no members. In essence, it is a trademark/copyright licensing vehicle and a financial conduit. Moreover, the corporations of Scientology are a carefully contrived sham and shell structure intended to confuse and divert litigants, the courts and the I.R.S. Indeed, Mission Corporate category sort out ("MCCS"), of which the MCCS tapes were a part, (see the Zolin case) was part of the creation of this corporate shell game.

21. Accordingly, it is absurd to allege that the words "Scientology" and "the church", as used in the relevant sections of the Time Magazine article, refer to anything other than Scientology or the Church generally and/or generically. Certainly, they are not of and concerning CSI.

SUPPRESSIVE PERSONS AND FAIR GAME

22. The legal strategy of Scientology and the existence of numerous potential legal problems, some of which are set forth below, were known to me when I was a staff member in Scientology.. Enemies of Scientology are deemed to be "suppressive persons" ("SPs"). One becomes a "suppressive person" by doing a suppressive act, such as suing Scientology as a litigant or lawyer. In the jargon of Scientology, when one is "declared" this means that one has been declared a "suppressive person" and, therefore, may be harassed, hurt, damaged or destroyed without regard to truth, honesty or legal rights. It is considered acceptable within Scientology to lie, cheat, steal and commit illegal acts in the name of dealing with a "suppressive person."

23. This practice or policy is sometimes referred to as the policy of "fair game." In the jargon of Scientology, a person who is declared is understood to be a suppressive person ("SP") . This means that the person is "fair game." The fair game policy was issued in the 1960s. It was never canceled. A document was issued for public relations reasons that purportedly canceled "fair game"; however, that document stated that it did not change the manner of handling persons declared "SP." In reality, the purported cancellation of fair game is at most a matter of semantics. Enemies of Scientology are treated as fair game.

24. Because of my position and the regular reports that came across my desk I know that throughout my presidency of RTC, fair game actions against enemies were commonplace. In addition to the litigation tactics described below, fair game activities included burglaries, assaults, disruptions of enemies' businesses, spying, harassing investigations, abuse of confidential communications in parishioner files and so on. I specifically recall seeing one report regarding attacks against Bent Corydon after Scientology became aware that he was writing a book against Hubbard.

FRIVOLOUS SCIENTOLOGY LITIGATION

25. Other Hubbard writings encourage Scientologists to pursue litigation purely for harassment without regard to the merits of a claim to cause enemies to fold. Hubbard's writings state: "The purpose of the suit is to harass and discourage rather than to win ... The law can be used very easily to harass and ... Will generally be sufficient to cause (the enemy's) professional deace. If possible, of course ruin him utterly." (Hubbard, "Magazine articles on Level 0 Checksheet" American Saint Hill Organization 1968.)

26. As President of RTC and a Sea Organization member, I attended meetings concerning the numerous legal actions involving Scientology organizations. During this time period, I had personal access to all legal documents having to do with RTC. I received a report every day on my computer that included a synopsis of each on-going legal case involving Scientology. I received, or so I was told, copies of every major motion filed in cases involving

Scientology was on the "approval lines" for legal documents dealing with RTC.

During this time period, I had the option of attending legal meetings, although some were mandatory. I attended many litigation meetings and became generally aware of Scientology's dirty tricks and legal maneuvers. On specifics, I frequently deferred to in-house and outside counsel; however, at least in theory, I was the head of RTC and had access to any business or litigation "secrets" of Scientology.

27. It is the stated policy and practice of Scientology to use the legal system to abuse and harass its enemies. This crude, fundamental directive of Scientology is no secret. The policy is to do anything and everything possible to harass the opposing litigant without regard to whether any particular motion or maneuver is appropriate or warranted by the facts of applicable law. That policy was followed in every legal case I was involved with or learned about while a member of the Sea Organization. The management of Scientology consistently expressed and demonstrated a complete disdain for the court system, viewing it as nothing more than a method to harass enemies. Some examples of this are set forth below.

SCIENTOLOGY DESTROYS EVIDENCE AND REWRITES HISTORY

28. During litigation between Gerald Armstrong and Scientology, which was before Judge Breckenridge of Superior Court for Los Angeles County, the court ordered the production of Armstrong's preclear ("PC") folders - These are files maintained by Scientology on those who submit to interrogation sessions in a process called auditing.

During the course of that litigation I was ordered to go through Armstrong's folders and destroy or conceal anything that might support Armstrong's claim against Scientology. This practice is known within Scientology as "culling PC folders" and is a common litigation tactic employed by Scientology.

29. During other-litigation in Los Angeles known to me as the Wollersheim case, I was told that the judge had ordered the production of Wollersheim's folders. As ordered, I "culled" these files. In other words, I removed contents that might have been damaging to Scientology or might have supported Wollersheim's claims against Scientology. For example, I removed evidence of events involving his family, the anguish this caused him, evidence of disconnection from family and evidence of fair game.

30. I was involved in numerous meetings concerning what is known to me as the Christofferson case in Portland, Oregon. This case was tried twice. In the first case, a Scientology witness by the name of Martin Samuels was coached and drilled for hours on how to lie convincingly or avoid telling the truth. Before or during the second trial, he admitted to this course of conduct. In this litigation, a Scientologist by the name of Joan Shriver produced responsive documents that may have been incriminating. This was a serious breach of policy for which she was punished. These documents were ordered produced on such a short notice that apparently files were not thoroughly "culled". In another case, an attorney was severely criticized and almost fired for failing to properly coach and feed the desired answers to Heber Jentsch. Mr. Jentsch was, for public relations reasons, the purported head of the Church of Scientology International. During his deposition, Mr. Jentsch was unable to answer fundamental questions concerning the management of Church of Scientology International.

31. While involved in Scientology I became aware of various operations directed against an author who had written a negative book about Scientology. The author, Paulette Cooper, was subjected to various forms of harassment. One operation included an attempt to frame her. A false bomb threat was written on her stationery. Ms. Cooper was subjected to an investigation and was not cleared until an FBI raid resulted in the seizure of Scientology documents that exposed the operation as a frame-up. There was at least one other operation directed against Ms. Cooper. The substance of it was to plant a boyfriend to reinforce and play upon her suicidal tendencies in the hopes that she would commit suicide.

32. In 1976 and 1977, the then Mayor of Clearwater, Florida, Gabe Cazares, was involved with litigation against Scientology. Arrangements were made to have an attorney by the name of Merrit Vanniere, a Scientologist, represent Mr. Cazares and sabotage his case. This plot was also exposed by documents obtained in an FBI raid of a Scientology facility. Also, in response to Mr. Cazares' litigation against Scientology, an attempt was made to implicate Mr. Cazares in a staged hit and run accident.

33. In later 1979 and early 1980, there was a massive document destruction program undertaken to destroy any evidence showing that L. Ron Hubbard ("LRH") controlled Scientology. I participated in this activity in Clearwater,

Florida and am informed that there was also intensive document destruction at facilities in Gilman Hot Springs, California. From at least that point onward there was a continuous effort to hide or destroy any evidence of Hubbard's control. For example, during an IRS investigation in 1984 and 1985, while in bed with pneumonia, I was ordered out of bed by Norman Starkey, who told me that they had received a tip from a Los Angeles police officer advising them of a pending IRS raid in Los Angeles.

Mr. Starkey ordered me to go to a computer facility and insure that all information on the computers in Los Angeles that might show Hubbard's involvement and control of Scientology's money was destroyed except for one copy of each document. These copies were to be saved on computer disks which were to be hidden in secure storage places. At the time I was also instructed to destroy anything that would show the control of Mr. Starkey or Mr. Miscavige over Scientology.

SCIENTOLOGY INFILTRATES THE U.S. GOVERNMENT

34. In or about 1981, while working in a Scientology organization known as the Guardian's Office, I had access to and observed various written and oral communication pertaining to illegitimate activities participated in by the Guardian's Office. The Guardian's Office attempted to infiltrate both governmental and private agencies including the IRS, the Department of Justice, the American Medical Association and the National Institute of Mental Health. The purpose of this was to steal documents pursuant to Hubbard's "Snow White" program. The goal of this program was to eliminate any negative reports about Hubbard and Scientology that may have been held by these various agencies.

FISHMAN ALLEGATIONS ARE CREDIBLE

35. I have examined certain documents regarding Steven Fishman's experience with Scientology, have had conversations with Mr. Fishman's counsel, in his criminal prosecution and I have reviewed the 1151-page autobiographical account of Mr. Fishman's Scientology experience entitled "The Lonesome Squirrel." Based on my 15 years of experience in Scientology and my review of the Fishman materials, I offer the following opinions and conclusions.

A. I believe Mr. Fishman's assertions that he was a member since 1979 and that he was actively involved as he states. This belief is based on my experience that only a committed member of long standing would know the details of the inner workings of the group; Mr. Fishman has such knowledge. Awareness of certain confidential projects could be achieved only by a member who was trusted by the hierarchy; Mr. Fishman had such awareness. Involvement in a group that thrives on secrecy and excludes most members from participation in high level projects means that any member who exceeds a certain level of involvement enjoys the trust of the leadership such trust would be earned only by extended membership. Mr. Fishman apparently enjoyed that trust. His accounts of meetings with high level officials and his knowledge of the operations and functions of the hierarchy are so detailed and accurate that they couldn't have been gained except through direct personal experience.

B. Refutation by Scientology officials of Mr. Fishman's membership prior to February 8, 1986 and their disclaimer of his involvement and their lack of any records pertaining to such membership is perfectly consistent with their standard procedure in protecting themselves. As noted above, I was personally involved in the destruction of records when it suited their purpose. Scientology propounds the belief that any action whatever taken to protect the organization is justified, as the group takes precedence over the individual. Any member performing criminal acts for the benefit of the group was kept at arm's length; if apprehended, the member was disavowed by Scientology. This procedure was used even on the wife of the founder of Scientology. Given the serious potential threat that Mr. Fishman's defense posed to the group, I find Mr. Fishman's account of certain members of Scientology's involvement in the plan to fabricate the threats against Mr. Fishman and his counsel and to thereby undermine Mr. Fishman's credibility and render him useless as a witness against Scientology is consistent with their modus operandi.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of March, 1994 at Dallas, Tx.

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